

CLARK, ATCHESON & REISERT  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ROYAL & SUN ALLIANCE INSURANCE PLC, :

Plaintiff, :

-against- :

OCEAN WORLD LINES, INC. :

Defendant. :

-----X  
OCEAN WORLD LINES, INC., :

Third-Party Plaintiff, :

-against- :

YANG MING MARINE TRANSPORT CORP. :  
and DJURIC TRUCKING, INC. :

Third-Party Defendants :

-----X

**ECF CASE**

**07-CV-2889 (AKH)**

**NOTICE OF MOTION**

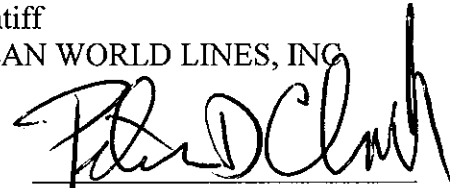
PLEASE TAKE NOTICE that the undersigned will move this Court, pursuant to Fed. Rule of Civ. P. 56 before the Honorable Alvin K. Hellerstein in Courtroom 14D, U.S. Courthouse, 500 Pearl Street, New York on February 13, 2008, upon the annexed declarations of Alan Baer, Esa Radoncic, and the exhibits annexed thereto, Rule 56:1 Statement of Undisputed Facts and accompanying Memorandum of Law for an order granting defendant partial summary judgment limiting defendant's liability \$500 per

package for damage to seven (7) packages of cargo on the grounds that the terms and provisions of the contract of carriage and the United States Carriage of Goods by Sea Act, 46 U.S.C. §30701 *et seq.*, limit defendant's liability to \$500 per package and for such other further relief as to the Court may deem just and proper.

Dated: North Bergen, NJ  
December 20, 2007

Clark, Atcheson & Reisert  
Attorneys for Defendant/Third Party  
Plaintiff  
OCEAN WORLD LINES, INC

By:



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TO: Law Offices of David Mazaroli  
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